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March 5, 2014

VIA ECF & Electronic Mail

The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 435
New York, NY 10007
ALCaterNYSDChambers@nysd.uscourts.gov

Re: Defendants' Motion to Exceed Page Limitation; *Lyons, et al. v. Litton Loan Servicing L.P., et al.*, No. 1:13-cv-00513 (ALC) (HBP)

Dear Judge Carter:

I represent the Defendants American Modern Insurance Group and American Modern Home Insurance Company (the "AMIG Defendants") in this matter. I write on behalf of the AMIG Defendants as well as defendants Assurant, Inc., American Security Insurance Company, and Standard Guaranty Insurance Company (the "Assurant Defendants"), and Goldman Sachs Group, Inc. and Arrow Corporate Member Holdings LLC (the "Goldman Defendants") to request leave to file a joint reply brief in support of the motions to sever (ECF Nos. 95-105, 109-110) in excess of the 10-page limitation pursuant to Rule 2.B of the Court's Individual Practices. In the interests of efficiency and for the convenience of the Court, in lieu of filing separate briefs replying to plaintiffs' Consolidated Opposition to Defendants' Motion to Sever (ECF No. 117), the AMIG Defendants, the Assurant Defendants, and the Goldman Defendants seek to file a joint reply brief in support of the motions to sever of no more than 15 pages.¹ The five additional pages will allow the AMIG Defendants, the Assurant Defendants, and the Goldman Defendants to fully and adequately address the arguments raised by plaintiffs in opposition to the motions to sever while still comprising fewer total pages than had they filed separate reply briefs.

¹ The Assurant Defendants intend to file a separate reply in support of their motions to dismiss pursuant to Rule 12(b)(1) (ECF Nos. 97-106).

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Respectfully submitted,

/s/ Mark A. Johnson

Mark A. Johnson (pro hac vice)

Counsel for Defendants American
Modern Insurance Group and
American Modern Home Insurance
Company

cc: All Counsel of Record (by ECF & Electronic mail)